



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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SK/JAM  
F.#2016R01828

*271 Cadman Plaza East  
Brooklyn, New York 11201*

July 20, 2017

By FedEx and ECF

Hassan Ahmad, Esq.  
David T. Roche, Esq.  
22 Cortlandt Street, 16<sup>th</sup> Floor  
New York, New York 10007

Re: United States v. Elvis Redzepagic  
Criminal Docket No. 17-228 (DRH)

Dear Messrs. Ahmad and Roche:

Enclosed please find the third production of the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The government reiterates its request for reciprocal discovery from the defendant.

Specifically, the government is providing the following materials, which have been marked as either "sensitive" or "highly sensitive" under the terms of the amended Stipulation and Protective Order issued on June 28, 2017:

- Defendant emails and records from the Metropolitan Detention Center, Bates numbered 12864-13306, marked "sensitive"
- Defendant recorded phone conversations from the Metropolitan Detention Center, Bates numbered 13366, marked "sensitive"
- Orbitz travel records, Bates numbered 13307, marked "highly sensitive"
- Saudi Air records, Bates numbered 13308-13344, marked "highly sensitive"
- Turkish Air records, Bates numbered 13345-13365, marked "highly sensitive"

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Please be advised that, pursuant to the policy of the Office concerning plea offers and negotiations, no plea offer is effective unless and until made in writing and signed by authorized representatives of the Office. In particular, any discussion regarding the pretrial disposition of a matter that is not reduced to writing and signed by authorized representatives of

the Office cannot and does not constitute a “formal offer” or a “plea offer,” as those terms are used in Lafler v. Cooper, 132 S. Ct. 1376 (2012), and Missouri v. Frye, 132 S. Ct. 1399 (2012).

Very truly yours,

BRIDGET M. ROHDE  
Acting United States Attorney

By: /s/ Artie McConnell  
Saritha Komatireddy  
Artie McConnell  
Assistant U.S. Attorneys  
(718) 254-6054/(631) 715-7825

Enclosures (ER 0000012864-0000013366

cc: Clerk of the Court (DRH) (by ECF) (without enclosures)